

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

JOSEPH ANTHONY DOWDALL

Debtor

Case No. 24-42950
Chapter 7

**UNOPPOSED SECOND MOTION TO EXTEND TIME
TO FILE OBJECTIONS TO DISCHARGE**

COMES NOW Mark A. Weisbart, Chapter 7 Trustee (the “Trustee”), and pursuant to, *inter alia*, 11 U.S.C. § 727 and FRBP 4004(b), files this *Unopposed Second Motion to Extend Time to File Objections to Discharge* (the “Motion”), and in support hereof, would show the Court the following:

1. On December 5, 2024, Joseph Dowdall (“Debtor”) filed a Voluntary Petition under Chapter 7 of Title 11 of the United States Code (the “Bankruptcy Code”) commencing the above-referenced bankruptcy proceeding.
2. Thereafter, Mark A. Weisbart was appointed the Chapter 7 Trustee and has since remained in that capacity.
3. The initial Meeting of Creditors was called on January 24, 2025, continued to March 14, 2025 and continued again to April 4 at 12:00 p.m.
4. The current deadline to file objections to discharge is April 24, 2025. Trustee, the Debtor, and parties related to the Debtor are engaged in settlement negotiations which include discharge issues. Accordingly, Trustee requests an extension of the deadline to object to the discharge of the Debtor to **Monday, May 26, 2025**. The requested extension is limited to the Trustee and the Office of the United States Trustee.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that the Court enter an

order granting the extension requested above and grant Trustee such other and further relief to which he is justly entitled.

Respectfully submitted,

/s/ Mark A. Weisbart
Mark A. Weisbart
Texas Bar No. 21102650
HAYWARD PLLC
10501 N Central Expy, Suite 106
Dallas, Texas 75231-2203
(972) 755-7103 Phone/Fax
MWeisbart@haywardfirm.com

COUNSEL FOR CHAPTER 7 TRUSTEE

CERTIFICATE OF CONFERENCE

This is to certify that the undersigned has conferred with Gerrit Pronske, counsel for the Debtor, and he agreed to the relief sought in this Motion.

/s/ Mark A. Weisbart
Mark A. Weisbart

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing instrument was served on the parties listed on the attached mailing matrix either through the Court's electronic notification system as permitted by Appendix 5005 to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage prepaid no later than the 24th day of April 2025.

/s/ Mark A. Weisbart
Mark A. Weisbart

Label Matrix for local noticing

0540-4

Case 24-42950

Eastern District of Texas

Sherman

Thu Apr 24 13:00:24 CDT 2025

Melissa S. Hayward

Hayward PLLC

10501 N. Central Expwy.

Suite 106

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City of Frisco

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C/O Sherrel K. Knighton

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Frisco, TX 75034-8563

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MMWKM Advisors LLC

c/o Patrick Yarborough

Foster Yarborough PLLC

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Julie Anne Parsons

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The County of Denton, Texas

McCreary Veselka Bragg & Allen, P.C.

c/o Julie Anne Parsons

P.O. Box 1269

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U.S. Attorney General

Department of Justice

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US Trustee

Office of the U.S. Trustee

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Suite 300

Tyler, TX 75702-7231

(p)MARK A WEISBART

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Mark A. Weisbart

Chapter 7 Bankruptcy Trustee

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Dallas, TX 75231-2203

(d)Mark A. Weisbart

Hayward PLLC

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)MMWKM Advisors, LLC

End of Label Matrix

Mailable recipients 17

Bypassed recipients 1

Total 18